

**REMARKS**

Claims 1-8, 10-21, 23-34 and 36-39 are pending. By this Amendment, claims 1, 14 and 27 are amended, and claims 9, 14, 35 and 40 are canceled without prejudice to or disclaimer of the subject matter recited therein. Support for the amendments is found in the specification at, for example, paragraphs [0024] and [0027]. No new matter is added. Reconsideration of the application is respectfully requested.

The courtesies extended to Applicants' representative by Examiner Vu at the interview held July 10, 2007, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicants' record of the interview.

The Office Action rejects claim 40 under 35 U.S.C. §101. Claim 40 is canceled by this Amendment. Therefore, this rejection is moot.

The Office Action rejects claims 1-4, 6-11, 13-17, 19-24, 26-30, 32-37, 39 and 40 under 35 U.S.C. §102(e) over U.S. Patent No. 6,968,511 to Robertson et al. (Robertson). This rejection is respectfully traversed.

Independent claims 1, 14 and 27 are amended to incorporate subject matter similar to that recited in canceled claims 9, 22 and 35, respectively, and to recite that a predetermined distance is at least one of a distance from the closest object in the second object/group, a distance from the center of the second object/group, and a distance from a boundary of the second object/group.

As discussed during the interview, Robertson discloses at col. 7, lines 18-14 and shows in Fig. 3 that a cluster has a graphical object associated with a cluster indicator and that the association between the cluster indicator and the graphical object is based on the visual proximity in the three-dimensional space between the graphical object and the associated indicator. In addition, Robertson discloses at col. 25, lines 25-51 and Fig. 25 that the

association of an object with a cluster is changed when the object is moved to another cluster, based on the distance between the object and the other cluster indicator. Therefore, as discussed and agreed to during the interview, in Robertson, the distance is measured between the object and the cluster indicator.

As agreed during the interview, Robertson does not teach or suggest that the predetermined distance is at least one of the distance from the closest object in the second object/group, a distance from the center of the second object/group, and a distance from a boundary of the second object/group, as recited in claims 1, 14 and 27.

Furthermore, as agreed during the interview, Robertson does not teach or suggest determining a distance between the object and a boundary of the group as shown in Fig. 1 of the application. The boundary is an example of the group membership display cue as discussed in paragraph [0024] of Applicants' specification.

At least for these reasons, Applicants respectfully submit that claims 1, 14 and 27 are patentable over Robertson.

Claims 2-4, 6-8, 10, 11, 13, 15-17, 19-21, 23, 24, 26, 28-30, 32-34, 36, 37 and 39 are allowable at least for their dependence on claims 1, 14 and 27, respectively, as well as for the additional features they recite.

For example, claims 13 and 39 recite providing an option not to assign the display cue to the first object/group and maintaining an original assignment of a display cue of the first object/group. Claim 26 recites that the object grouping circuit provides an option not to assign the display cue to the first object/group, and that the display cue assignment circuit maintains an original assignment of a display cue of the first object/group. As agreed to during the interview, Robertson does not teach or suggest providing an option not to assign the display cue to the first object/group, but only allows the object to have the original

assignment if the object is moved near the cluster indicator with which the object is originally assigned.

The rejection of canceled claims 9, 22, 35 and 40 is moot.

At least for these reasons, withdrawal of the rejection is respectfully requested.

The Office Action rejects claims 5, 12, 18, 25, 31 and 38 under 35 U.S.C. §103(a) over Robertson in view of U.S. Patent No. 5,371,844 to Andrew et al. (Andrew). This rejection is respectfully traversed.

Andrew does not cure the deficiencies of Robertson with respect to independent claims 1, 14 and 27 as discussed above. Therefore, claims 5, 12, 18, 25, 31 and 38 are allowable at least for their dependence on allowable base claims, as well as for the additional features they recite. Accordingly, withdrawal of the rejection is respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of the claims are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



James A. Oliff  
Registration No. 27,075

Linda M. Saltiel  
Registration No. 51,122

JAO:KXH/tls

Date: August 15, 2007

**OLIFF & BERRIDGE, PLC**  
**P.O. Box 19928**  
**Alexandria, Virginia 22320**  
**Telephone: (703) 836-6400**

<p>DEPOSIT ACCOUNT USE AUTHORIZATION Please grant any extension necessary for entry; Charge any fee due to our Deposit Account No. 15-0461</p>
--